

REMARKS

Claims 1-4 and 6 are pending in the present application. Claims 1, 4 and 6 are independent.

In the Office Action, claims 1-4 and 6 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,700,989 to Itoh et al. (hereinafter referred to as "Itoh").

Itoh describes a method and apparatus for embedding a watermark into moving images, such as, for example, a video. The watermark is embedded in such a way that it is visually unperceivable in the video while it is playing, but the watermark becomes visually perceivable when the moving image is brought to a standstill (See Itoh, Abstract).

Claim 1 is not anticipated by Itoh because claim 1 recites, "accumulating spatially corresponding coefficients of a plurality of pictures." Nowhere does Itoh teach or suggest accumulating spatially corresponding coefficients of a plurality of pictures, as recited in claim 1.

In the Office Action, the Examiner posits that Itoh teaches the aforementioned feature in Col 29, lines 55-56 which states, "compressed data are expanded by an MPEG decoder 56", however applicants respectfully disagree. Accumulating spatially corresponding coefficients of a plurality of pictures, as recited in claim 1, is not the same as expanding compressed data.

Paragraphs 17 and 18 of the previously presented substitute specification, and Figures 1 and 2 describe one example of accumulating spatially corresponding coefficients of a plurality of pictures, as recited in claim 1. In this example, the coefficients of a plurality of pictures are accumulated; in stark contrast, Itoh teaches an expansion of data by an MPEG decoder. One skilled in the art would recognize that these are inconsistent features, therefore Itoh does not

teach each element of claim 1 and thus claim 1 is not anticipated by Itoh. (“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

In addition since, Itoh does not teach or suggest accumulating coefficients, Itoh does not teach or suggest inverse transforming accumulated coefficients nor detecting a watermark in an accumulated plurality of pictures, as recited in claim 1. For the reasons stated above, applicants respectfully request that the Examiner withdraw this rejection.

Claims 2 and 3 depend from claim 1 and are therefore not anticipated by Itoh for at least the reason discussed above with respect to claim 1.

Independent claims 4 and 6 recite limitations similar to claim 1, and are therefore not anticipated by Itoh for at least the reason discussed above with respect to claim 1.

The Commissioner of Patents is hereby authorized to charge any additional fees or surcharges that may be required, or credit any overpayment to Account No. 14-1270.

Respectfully submitted,

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